



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

RQ-2

NOV 8 1995

Thomas Thrash, Treasurer  
Georgia Federal Elections  
Committee  
1100 Spring Street, Suite 420  
Atlanta, GA 30309

Identification Number: C00041269

Reference: Mid-Year Report (1/1/95-6/30/95)

Dear Mr. Trash:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR §103.3(b). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a

GEORGIA FEDERAL ELECTIONS COMMITTEE  
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refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-Schedule H3 of your report discloses a transfer(s)-in from a non-federal account(s) for A023 and administrative /voter drive costs which appears to exceed the permissible amount(s) indicated by your allocation ratio for event and category of disbursements. Please be advised that transfers for shared activity must not exceed the non-federal share of the joint disbursements and that these transfers must be made within a 70-day time period: no more than 10 days before or 60 days after payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2) Please clarify the nature of these transfers-in from the non-federal account.

The Commission recommends that you immediately transfer the total excessive amount received by your federal account back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.


-The Commission notes the refund of the funds received from your non-federal account. You are advised that the transfer-in of funds from a non-federal account is prohibited by 11 CFR §102.5(a)(1)(i).

Although the Commission may take further legal action concerning the acceptance of impermissible funds, your prompt action will be taken into consideration.

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A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Jan McBride  
Reports Analyst  
Reports Analysis Division

## Schedule A      I T E M I Z E D      R E C E I P T S

Page 2 of 3 for  
LINE NUMBER 110

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee:

Georgia Federal Elections Committee

| A. Full Name, Mailing Address, and Zip Code                               | Date     | Amount of Each Receipt This Period |
|---|----------|------------------------------------|
| FUND FOR BETTER GOVERNMENT<br>NO. 2<br>P.O. BOX 4148<br>ATLANTA, GA 30302 | 04/17/95 | 5,000.00                           |
| Receipt for:  |          |                                    |
| Aggregate Year-To-Date \$   | 5,000.00 |                                    |

| B. Full Name, Mailing Address, and Zip Code                                       | Date     | Amount of Each Receipt This Period |
|---|----------|------------------------------------|
| GEORGIA BANK PAC FEDERAL FUND<br>50 HURT PLAZA<br>SUITE 1050<br>ATLANTA, GA 30303 | 04/06/95 | 1,500.00                           |
| Receipt for:  |          |                                    |
| Aggregate Year-To-Date \$   | 1,500.00 |                                    |

| C. Full Name, Mailing Address, and Zip Code   | Date     | Amount of Each Receipt This Period |
|---|----------|------------------------------------|
| GEORGIA POWER COMPANY<br>FEDERAL PAC, INC.<br>POST OFFICE BOX 4545<br>ATLANTA, GA 30302 | 02/16/95 | 1,500.00                           |
| Receipt for:  |          |                                    |
| Aggregate Year-To-Date \$   | 1,500.00 |                                    |

| D. Full Name, Mailing Address, and Zip Code   | Date     | Amount of Each Receipt This Period |
|---|----------|------------------------------------|
| KING & SPALDING NONPARTISAN<br>COMMITTEE FOR GOOD GOVERNMENT<br>2500 TRUST COMPANY TOWER<br>ATLANTA, GA 30303 | 02/13/95 | 1,500.00                           |
| Receipt for:  |          |                                    |
| Aggregate Year-To-Date \$   | 1,500.00 |                                    |

| E. Full Name, Mailing Address, and Zip Code   | Name of Employer | Date     | Amount of Each Receipt This Period |
|---|------------------|----------|------------------------------------|
| POWELL, GOLDSTEIN, FRAZER & MURPHY<br>POLITICAL ACTION COMMITTEE<br>191 PEACHTREE STREET, NE<br>ATLANTA, GA 30303 | Occupation       | 02/17/95 | 3,000.00                           |
| Receipt for:  |                  |          |                                    |
| Aggregate Year-To-Date \$   |                  | 3,000.00 |                                    |

SUBTOTAL of Receipts This Page \$ 12,500.00

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